

United States District Court  
For the Northern of Illinois

FILED  
SEP 26 2023 ELW  
THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

**Matthew Schwartz**  
**Petitioner-Defendant**

Vs.

**Case no. 1:21-cr-00316**

**United States of America**  
**Respondent-Plaintiff**

**Motion for Leave to File Reply in Support  
Of Motion for Compassionate Release**

Now comes the Defendant/Movant, Matthew Schwartz, Pro Se, (hereinafter, "Mr. Schwartz") and for his motion for leave to file his reply in support of his motion for compassionate release, and, in support thereof, states as follows:

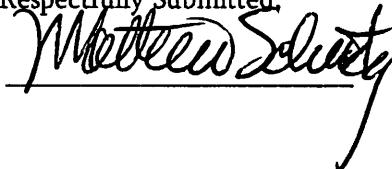
1. On or about August 25, 2023, this Honorable Court entered a minute order indicating, in part, that following the Government's response filing, no further party filings would be necessary regarding Mr. Schwartz' motion for compassionate release.
2. Mr. Schwartz respectfully requests that the Court reconsider this position and permit his filing of a reply herein based principally upon the fact that additional and very meaningful medical records have been secured which will provide the Court with a more detailed and compelling basis in its deliberations on the instant motion.

3. In that Mr. Schwartz principal motion for Compassionate release contention centers on the April 5, 2023 sentencing commission amendment involving a showing that an inmate's medical conditions and medical challenges would be materially better served of on home confinement, the additional medical record presentment at this time further strengthening this position is critically important.

4. Based upon the foregoing, Mr. Schwartz respectfully requests leave to EITHER be permitted to amend and supplement his previous motion filing, or to, instead, be permitted to file his reply herein to supply this additional and supporting information.

Wherefore, the Defendant/Movant, Matthew Schwartz prays that this Honorable Court enter and order in accordance with the foregoing request and for such other and further relief as this Court deems is just and proper.

Respectfully Submitted,



Matthew Schwartz

Pro Se Defendant / Movant

Reg. No 54469-424

FCI Milan

4004 East Arkona Road,

Milan, MI 48160

#### **CERTIFICATE OF FILING**

I, Matthew Schwartz, declares under penalty of perjury and under the federal mailbox rule that I filed this Motion for Leave to File Reply in Support Of Motion for Compassionate Release by placing a true and correct copy into the Institutional Mail, pre-paid USPS First Class, on September 2023, addressed to:

Clerk of the Court

U.S. District, Court  
Northern District of Illinois  
219 South Dearborn St  
Chicago, Illinois 60604

Matthew Schwartz  
Pro Se Defendant / Movant  
Reg. No. 54469-424  
FCI Milan  
4004 East Arkona Road,  
Milan, MI 48160

DAVID GROSKY  
5645 GRANT LANE  
MORTON GROVE ILLINOIS  
60053

CAROL STREAM IL 601

023 PM 2 L



09/26/2023-37

CLERK OF THE COURT  
UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
219 SOUTH DEARBORN STREET  
CHICAGO, ILLINOIS 60604

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